



March 16, 2022

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

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Re: *Securities and Exchange Commission v. AT&T Inc. et al.*, No. 21 Civ. 1951 (PAE) –
Joint Letter Motion to Modify Deadlines in Civil Case Management Plan and Scheduling Order

Dear Judge Engelmayer:

Plaintiff and Defendants (collectively, the “Parties”) write jointly to respectfully request that Your Honor enter the attached proposed Third Amended Civil Case Management Plan and Scheduling Order (the “Proposed Amendment”).

Specifically, the Proposed Amendment solely seeks a seven-day extension of expert discovery deadlines in order for the Parties to complete expert depositions. All other case deadlines, including for summary judgment briefing, shall remain the same.

Plaintiff has designated five experts and, pursuant to the Second Amended Civil Case Management Plan and Scheduling Order (Dkt. No. 61), Defendants shall designate their experts on March 18, 2022. Plaintiff shall serve rebuttal expert reports by April 7, 2022, and expert discovery closes on April 15, 2022. Extending the deadline for expert discovery by seven days—from April 15, 2022 to April 22, 2022—will provide the parties with more time to prepare for and to complete the numerous expert depositions. The Parties do not believe the Proposed Amendment will affect any other case deadlines; however, consistent with Your Honor’s Individual Practices and the Local Rules of the Court, the Parties reserve the right to request extensions to interim deadlines to the extent appropriate and necessary, while keeping the current deadline for the completion of summary judgment briefing intact.

Accordingly, the Parties believe that good cause exists for the current request and respectfully request Your Honor to enter the attached Proposed Third Amended Case Management Plan and Scheduling Order.

We remain available for a teleconference at Your Honor’s convenience if the Court wishes to discuss our joint request.



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Very truly yours,

/s/ Richard S. Krumholz

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Attachment

Cc: All Counsel of Record (via ECF)